



BARTON L. KLINE
Senior Attorney

August 5, 2002

Ms. Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 W. Washington Street
P.O. Box 83720
Boise, Idaho 83720-0074

Re: Case No. GNR-E-02-1
Direct Rebuttal Testimony of Witness
Dennis E. Peseau

Dear Ms. Jewell:

Please find enclosed for filing with the Commission nine (9) copies of the Direct Rebuttal Testimony and Exhibits of Witness Dennis E. Peseau, with the original designated as the Reporter's Copy. Copies of these documents have been mailed or hand-delivered to parties of record as indicated in the enclosed Certificate of Service.

Also enclosed is a computer disk containing the Direct Rebuttal Testimony of the above-named witness for use by the court reporter.

I would appreciate it if you would return a stamped copy of this transmittal letter for our files.

Very truly yours,

/s/
Barton L. Kline

BLK:jb
Enclosures

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE INVESTIGATION)
OF THE CONTINUED REASONABLENESS OF)
CURRENT SIZE LIMITATIONS FOR PURPA) CASE NO. GNR-E-02-1
QF PUBLISHED RATE ELIGIBILITY)
(i.e., 1 MW) AND RESTRICTIONS ON)
CONTRACT LENGTH (i.e., 5 YEARS))
)

IDAHO POWER COMPANY

DIRECT REBUTTAL TESTIMONY

OF

DENNIS E. PESEAU

1 Q. Please state your name and business address.

2 A. My name is Dennis E. Peseau. My business
3 address is Suite 250, 1500 Liberty Street, S.E., Salem,
4 Oregon 97302.

5 Q. Are you the same Dennis E. Peseau who
6 submitted pre-filed direct testimony in these proceedings,
7 GNR-E-02-1?

8 A. Yes.

9 Q. What is the purpose of your rebuttal
10 testimony?

11 A. The Commission set this hearing to receive
12 evidence on the reasonableness of the variables in the
13 existing avoided cost rate methodology.

14 While the list of surrogate avoided resource
15 ("SAR") variables is somewhat extensive, I contended in my
16 direct testimony (Peseau, page 4, Lines 9-23) that two of
17 the variables, the initial year 2002 natural gas price and
18 the natural gas price escalator were far and away the more
19 important. My review of all parties' testimony in these
20 proceedings reinforces my conclusion. My Exhibit 107
21 summarizes all parties' proposed values for the SAR
22 variables.

23 The purpose of my rebuttal testimony is to
PESEAU, DI-REB 1
Idaho Power Company

1 comment on the initial year natural gas prices and gas
2 price escalation rates recommended by other parties. I
3 also briefly discuss Staff's, IEPI's and Plummer
4 Forest/Potlatch's ("PFP-PC") proposal to assume away the
5 surplus period for purposes of computing avoided cost
6 rates.

7 In particular, I argue that:

8 1. The relevant initial natural gas price
9 is that which is most representative of current natural gas
10 prices, not an average of several past years. Both Staff's
11 and IEPI's use of five year and three year averages,
12 respectively, of historical gas prices are not
13 representative of current gas prices. PacifiCorp's
14 forecast appears to simply be mistaken.

15 2. Staff's use of a single forecast of
16 natural gas escalation is unnecessary and results in a very
17 high escalation rate compared with several other forecasts.

18 3. IEPI's use of a "medium-high" forecast
19 of the natural gas escalation rate will assure that
20 ratepayers will have higher than necessary electric rates.

21 4. The proposals to ignore surpluses in
22 the utilities' load/resource balance, while not
23 quantitatively significant for Idaho Power in this case,

1 could in the future lead to excessive QF avoided cost
2 rates.

3 Q. Please list the various parties' proposed
4 assumptions regarding initial gas prices and the gas price
5 escalator.

6 A. The following table summarizes the parties'
7 positions with respect to these two variables:

8	<u>Initial Gas Price (\$MMBtu)</u>	<u>Gas Price Escalator</u>
9	<u>(%)</u>	
10	Staff \$3.19	4.4%
11	IPCo 2.79	2.52
12	Avista 2.80	n.a.
13	PacifiCorp 3.95	1.97
14	IEPI 3.84	3.10
15	PFP-PC 5.23	3.10

16 INITIAL YEAR NATURAL GAS PRICE

17 Q. What is the initial year's gas price
18 supposed to represent?

19 A. This variable attempts to set a reasonable
20 first year natural gas price at Sumas, Washington with an
21 additional \$.35 MMBtu Northwest Pipeline Company
22 transportation rate for delivery to the utility.

23 Q. What is today's gas price at Sumas?

1 A. The July 30, 2002 gas price at Sumas was
2 \$1.835 per MMBtu, or \$2.19 per MMBtu delivered to Idaho
3 Power.

4 Q. Why are the initial gas prices proposed by
5 the parties so much higher than actual prices?

6 A. The PFP-PC price of \$5.23 is simply the old
7 gas price, not updated. I was unable to determine how
8 Avista derived its price. I used the estimate for the 2002
9 gas price. Staff and the IEPI computed averages of several
10 years of historical prices. PacifiCorp used a forecasting
11 service.

12 Q. Do you agree with the Staff's use of a five
13 year average of gas prices as an indicator of the 2002
14 price?

15 A. No. I do however, understand Staff witness
16 Mr. Sterling's attempt to " . . . establish a starting fuel
17 price so that the effect of extreme variations in prices
18 does not become permanently embedded in contracts. . ."
19 (Sterling direct, Page 4, Lines 13-16). And I also agree
20 with Mr. Sterling that " . . . A single year of very high
21 or low gas prices should not drive the avoided cost rate
22 for a twenty-year contract. . ." (Sterling, Page 4, Lines
23 16-18). Mr. Sterling recognized that the spike in natural

1 gas prices from the period May 2000 to June 2001 caused an
2 upward bias in his Exhibit 4 regression results and
3 rejected these results in favor of his five year rolling
4 average.

5 Q. Does Mr. Sterling's five year rolling
6 average of natural gas prices completely do away with an
7 upward bias initial year gas price?

8 A. No, not entirely. Following the gas price
9 spike of May 2000 - June 2001, gas prices at Sumas have
10 returned to their historic trends.

11 Q. Please explain.

12 A. I refer to the graphs of historical prices
13 at Sumas as shown in both Mr. Sterling's Exhibit No. 5 and
14 a more recent update in my Exhibit 108. The point I wish
15 to make is that this one time market price spike is being
16 given a 20% weight in the five year average when it clearly
17 had never happened before and, as yet, happened after this
18 period. Unless one predicts that this spike will occur
19 once every five years, the present estimate of initial year
20 gas price will be exaggerated. And, the extent of the
21 exaggeration is a function of the number of years chosen
22 for the average. For example, Mr. Sterling's initial year
23 price of \$3.19 per MMBtu is raised to \$3.84 per MMBtu by

1 IEPI witness Mr. Trippel simply by using a three year
2 rather than a five year average.

3 Q. Has this Commission recently recognized the
4 potential effects on ratepayers from overweighting the May
5 2000 - June 2001 gas price spike?

6 A. Yes. Order No. 29069 indicates on Pages 7-8
7 that:

8 . . . The Commission cannot expose
9 ratepayers to avoided cost rates that rely heavily
10 on gas price levels that existed during the recent
11 volatility in the market. To do so would condemn
12 ratepayers to the lingering effects of last year's
13 energy crisis for another 20 years . . .

14 Q. What principles do you recommend be followed
15 to minimize the overweighting of either extraordinary price
16 spikes or dips for purposes of estimating avoided cost
17 rates?

18 A. The purpose of estimating the initial year's
19 gas price is to predict the going-forward price. Unless
20 the present period appears to be one of very high or very
21 low prices, the principle ought to be to use current data
22 and price forecasts. I have attempted to do this in
23 reaching my recommended initial year price of \$2.79 per

1 MMBtu as described in my direct testimony, Pages 7-12.

2 Q. Since the time of the filing of your direct
3 testimony, have you calculated gas prices at Sumas,
4 delivered to Idaho Power?

5 A. Yes. My Exhibit 109 lists the most recent
6 twelve months of gas prices at Sumas. The annual average
7 price ending July 31, 2002 is \$2.31 per MMBtu. The
8 delivered price to Idaho Power is \$2.66 per MMBtu. This
9 information together with the price forecasts for 2002-2003
10 that I refer to in my direct testimony lead me to conclude
11 that my proposed initial year price of \$2.79 MMBtu remains
12 reasonable.

13 Q. Have Sumas gas prices this past year been
14 low by historical standards?

15 A. No. The graph on Mr. Sterling's Exhibit
16 No. 5 shows that the July 31, 2002 annual average Sumas
17 price of \$2.31 per MMBtu is the highest annual average
18 since 1993, except for the May 2000 - June 2001 price
19 spike.

20 Q. What initial year gas price is PacifiCorp
21 proposing?

22 A. \$3.95 per MMBtu.

23 Q. Do you consider this price to be reliable

1 for purposes of an initial year gas price?

2 A. No. I have to conclude that this number is
3 in error. Page 14 of the direct testimony of PacifiCorp
4 witness Mr. Widmer explains that monthly Sumas gas prices
5 were forecast by a firm named PIRA. A table on Page 14 of
6 Mr. Widmer's direct testimony provides PIRA's monthly
7 forecast values for Sumas gas for June - December 2002, for
8 the first day of each month.

9 Q. What values did PIRA predict for June 1,
10 July 1 and August 1, 2002?

11 A. \$3.13, \$3.19 and \$3.23 per MMBtu for June 1,
12 July 1 and August 1, respectively.

13 Q. What are the actual Sumas gas prices on
14 these same dates?

15 A. \$2.23, \$1.38 and \$1.57 per MMBtu,
16 respectively.

17 I conclude that the PIRA forecast is either
18 very dated, or simply not reliable. Actual Sumas gas
19 prices are about half of PIRA's forecast values.

20 Q. Would your recommendation to use recent
21 "normal" natural gas prices result in the need to annually
22 review whether gas prices are "normal"?

23 A. Yes, but this is simply a necessity

1 associated with estimating accurate avoided costs. From
2 the graph in my Exhibit 108, I believe that there is little
3 opportunity for parties to have much of a difference of
4 opinion as to whether current gas prices are abnormally low
5 or abnormally high.

6 Q. Could a longer-term averaging of natural gas
7 prices such as recommended by Mr. Sterling be made more
8 workable and less prone to bias?

9 A. Yes, although my primary proposal is to stay
10 with current prices. The bias I previously described is
11 due in large part to the potential for including an
12 "outlier" or a period of unrepresentative gas price data.
13 An example of a five-year rolling average technique that
14 would lessen this potential bias would be to consider, say,
15 seven recent years of data and exclude the high and low
16 years.

17 ESCALATOR FOR NATURAL GAS PRICE

18 Q. Please address the issues associated with
19 the gas price escalator variable.

20 A. As I have discussed in my direct testimony,
21 the gas price escalator used to inflate gas prices for non-
22 fueled facilities has a huge impact on longer-term
23 contracts due to the fuel cost levelizing feature of such

1 contracts.

2 Staff witness Mr. Sterling proposes to use
3 an escalator of 4.4% and the IEPI witness Mr. Trippel
4 proposes to use a 3.10% escalator. I believe that each of
5 these escalators is too high.

6 Q. Why do you believe that the 4.4% escalator
7 proposed by Staff is too high?

8 A. As explained in Mr. Sterling's direct
9 testimony, Pages 6-7, he recommends use of the DOE/EIA
10 *Annual Energy Outlook* gas price escalation forecast. The
11 DOE/EIA forecast predicts a 1.7% real increase in gas
12 prices over a twenty year period. This rate of increase in
13 real gas prices is extremely high.

14 First, as has been discussed in conjunction
15 with Mr. Sterling's Exhibit No. 5 and my Exhibit 108,
16 natural gas prices at Sumas have decreased or remained
17 constant in real terms for more than a decade.

18 Second, my Exhibit 106, the draft Fuel Price
19 Forecast of the Northwest Power Planning Council, Table D,
20 Page F-1 shows no or very little real increase in east-side
21 delivered Northwest regional gas prices over a twenty year
22 period, depending on the reference year. Table 2, Page 16
23 of the same document shows natural gas prices falling in

1 real terms until the year 2005 and then escalating in real
2 terms from 2005-25 from 0.2% to 1.06% in the low and high
3 forecasts, respectively.

4 I conclude that Mr. Sterling's nominal fuel
5 price escalator of 4.4% (2.7% + 1.7%) is too high.

6 Q. Do you agree with Mr. Sterling's direct
7 testimony on pages 6-7 where he recommends using a single
8 forecast issued by DOE/EIA?

9 A. No, I do not. Mr. Sterling recommends use
10 of this forecast because it is updated annually and is
11 readily available without charge or subscription fee.
12 Forecasting prices of commodities is difficult and in the
13 interest of both QFs and ratepayers, we ought to rely on as
14 much information and as many quality institutions as
15 possible. The Power Planning Council Fuel Price Forecast
16 document refers to and relies upon several independent
17 forecasts, including the DOE/EIA. Mr. Sterling's initial
18 objection to use of the Council's consensus forecasts was
19 its untimely updates. However, as referenced by the IEPI
20 witness Mr. Trippel, the Council now intends to frequently
21 update these forecasts.

22 I recommend that the Commission rely on a
23 number of forecasts in establishing a fuel price escalator.

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Idaho Power Company

1 Q. How did the IEPI witness Mr. Trippel reach
2 his recommended fuel escalation rate of 3.10%?

3 A. Mr. Trippel, on Pages 6-8 of his direct
4 testimony, requests that the Commission adopt a "medium-
5 high" forecast developed by the Power Planning Council, and
6 as discussed in my Exhibit No. 106.

7 Q. What is meant by the term "medium-high"
8 forecast?

9 A. The Council typically produces five
10 different forecasts based upon five different levels of
11 statistical probabilities of occurring. The five forecasts
12 are termed low, medium-low, medium, medium-high and high.
13 The medium forecast has 50% chance of being too high and a
14 50% chance of being too low. The others do not.

15 Q. Do you agree with Mr. Trippel that this
16 Commission should adopt the Council's medium-high fuel
17 price escalator of 3.10% per year?

18 A. No. In the PURPA compact regarding avoided
19 costs, both QFs and ratepayers assume the risks of being
20 wrong. I see no reason to skew this risk one way or the
21 other. We should adopt the best forecast available. The
22 best forecast is that which has the highest probability of
23 being right. This is, by definition, the medium or central

1 tendency forecast.

2 FIRST YEAR DEFICIT

3 Q. What is the issue with respect to the first
4 year deficit variable?

5 A. Levelized avoided costs under the SAR method
6 are a combination of costs in the utility's initial surplus
7 period, measured as surplus prices, and the annualized SAR
8 costs in all subsequent periods once the surplus period
9 ends. If prices in the surplus period are lower than the
10 full incremental cost of the SAR, the avoided cost rates
11 will always be lower, the longer the projected surplus
12 period.

13 Due to the effect on avoided cost rates and
14 the controversies usually associated with projecting a
15 surplus period, the Staff, the IEPI and the PFP-PC request
16 that the Commission, in effect, deem each of the three
17 utilities to be in load/resource balance today for purposes
18 of computing avoided cost rates.

19 Q. What arguments are made by these parties in
20 defense of assuming away any surplus period?

21 A. Staff witness Mr. Sterling provides a
22 comprehensive list of arguments on Pages 7-9 of his direct
23 testimony.

1 Q. What is your opinion on this issue?

2 A. I do not take issue with any of the nine
3 points raised by Mr. Sterling. In the twenty years I have
4 conducted avoided cost studies, the points raised by Mr.
5 Sterling have frequently arisen. The problem I see in
6 dismissing these important issues is that, by definition,
7 the avoided cost estimates derived under the "no-surplus"
8 assumption will not comply with the "but for" or
9 "incremental costs" of the specific utility, as provided
10 for by PURPA, but will necessarily be higher.

11 Certainly, it would seem to me to be
12 necessary in each and every avoided cost determination to
13 determine how far using this assumption would take QF
14 purchase prices away from the utilities' actual avoided
15 costs. In order for a simplifying assumption *for any SAR*
16 *variable* to comply with PURPA, the assumption should not
17 generate avoided cost rates that depart significantly from
18 avoided cost calculations that use more realistic
19 assumptions.

20 Q. How important is the first year deficit
21 issue in the present proceeding?

22 A. The issue is always important. However, as
23 I testified on Page 16, Lines 3-5, of my direct testimony,
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Idaho Power Company

1 the quantitative effect on Idaho Power's estimated avoided
2 cost rates under my assumptions is not great in this case
3 due to the higher assumed price for surplus energy. I do
4 not know how great a departure from actual avoided costs
5 the "no-surplus" assumption causes for Avista and
6 PacifiCorp.

7 Q. What is your recommendation to the
8 Commission on this issue?

9 A. In my direct testimony, I recommended that
10 the Commission in these proceedings adjust the two
11 overwhelmingly significant variables - the initial natural
12 gas price and the natural gas price escalator and more
13 fully investigate the remaining variables in a subsequent
14 forum. Given the proposal on assuming no surplus period
15 made by some parties, and the potential significance that
16 this simplifying assumption has on the level of computed
17 avoided cost rates, I reiterate this recommendation.

18 A second recommendation I have is made by
19 reference to some historical perspective on this issue.
20 While the nine points raised by Mr. Sterling are indeed
21 issues to consider, they are by no means beyond solving.
22 In the early 1980s in Idaho, more rigorous modeling was
23 used to attempt to answer the deficit period and associated

1 issues. The issues raised by Mr. Sterling are technical by
2 nature because resource planning and utility operations are
3 technical by nature. Just as the transition from resource
4 surpluses to resource deficits has placed heightened
5 attention to resource planning, the Commission may want to
6 revisit certain elements of the SAR method as well.

7 Q. Does this conclude your rebuttal testimony?

8 A. Yes.

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

CASE NO. GNR-E-02-1

IDAHO POWER COMPANY

EXHIBIT NO. 107

DENNIS E. PESEAU

GNR-E-01-1
Comparison of Assumptions of Participants

Item	Staff	IPC	Avista	PacifiCorp	IEPI	Potlatch
Surplus Cost (mil/kWh)	na	28.28	22.12	33.54	na	na
Surplus Base	na	2002	2002	2002	na	na
Surplus 2002 (mil/kWh)	na	28.28	22.12	33.54	na	na
Deficit Year	2002	2005	2007	2008	2002	2002
SAR Cost (\$/kW)	679	729	577	632	667	667
SAR Base	2000	2002	2000	2002	1994	1994
SAR 2002 (\$/kW)	708	729	605	632	885	885
SAR Cap Factor (%)	92.00%	92.00%	89.50%	92.00%	92.00%	92.00%
SAR Fixed O&M (\$/kW)	10.70	9.48	14.75	7.00	7.43	7.43
SAR Var O&M (mil/kWh)	2.80	3.31	2.80	1.61	1.65	1.65
O&M Base	2000	2002	2000	2002	1994	1994
Fixed O&M 2002 (\$/kW)	11.29	9.48	15.47	7.00	9.57	9.57
Var O&M 2002 (mil/kWh)	2.95	3.31	2.94	1.61	2.12	2.12
2002 Fuel Cost (\$/mmBtu)	3.19	2.79	2.80	3.95	3.84	5.23
SAR Heat Rate (btu/kWh)	7100	6994	7340	7074	7350	7350
SAR Fuel Cost (mil/kWh)	22.65	19.51	20.55	27.94	28.22	38.44
SAR Esc. (%)	2.10%	2.52%	2.40%	2.00%	3.60%	3.60%
Surplus Esc. (%)	na	5.90%	na	4.80%	4.50%	4.50%
O&M Esc. (%)	2.70%	2.52%	2.40%	2.50%	3.21%	3.21%
Fuel Esc. (%)	4.40%	2.62%	na	1.97%	3.10%	3.10%
Tilting Rate (%)	2.10%	2.52%	2.40%	2.50%	3.60%	3.60%

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

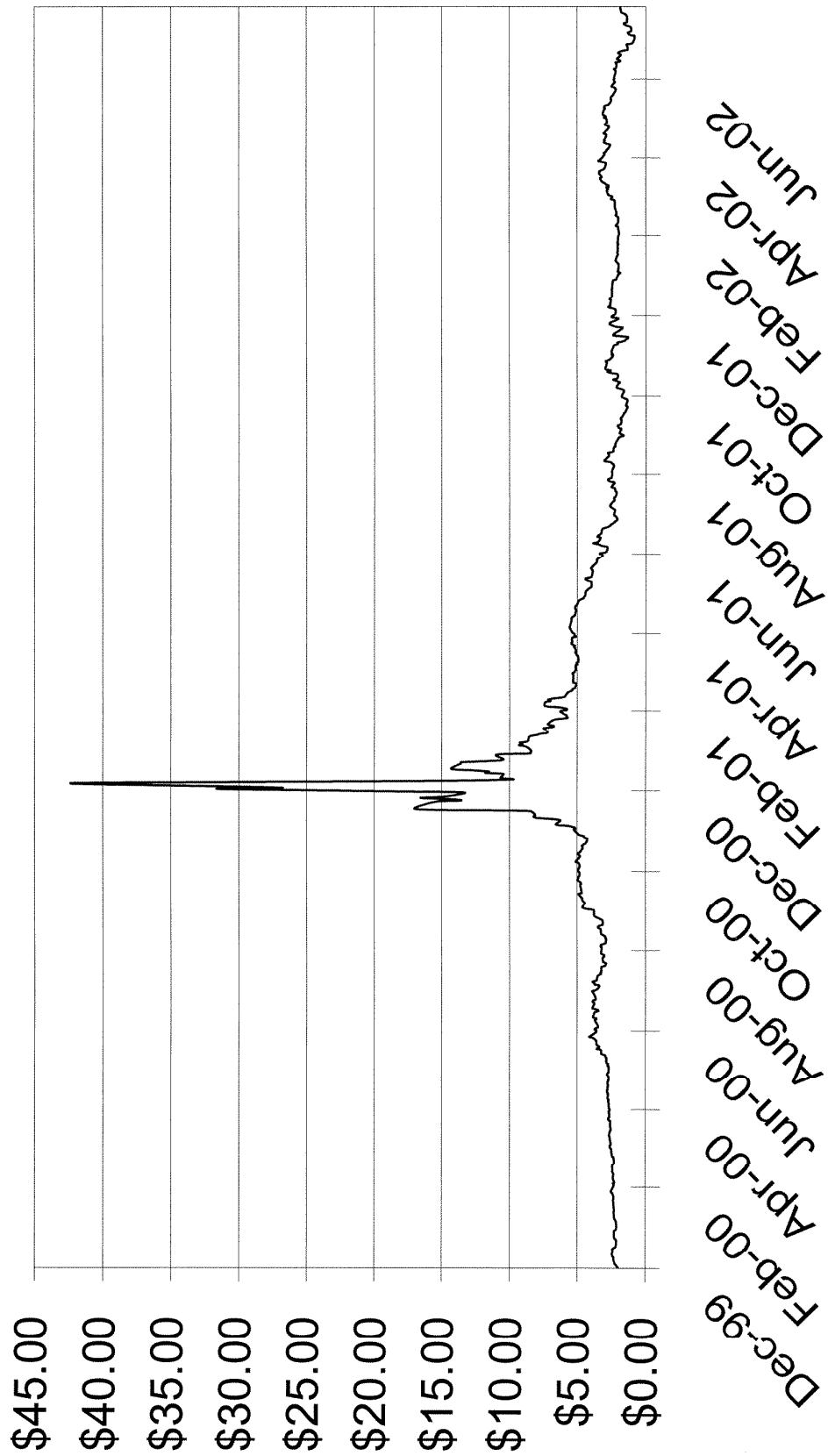
CASE NO. GNR-E-02-1

IDAHO POWER COMPANY

EXHIBIT NO. 108

DENNIS E. PESEAU

Daily Natural Gas Prices at Sumas



BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

CASE NO. GNR-E-02-1

IDAHO POWER COMPANY

EXHIBIT NO. 109

DENNIS E. PESEAU

NATURAL GAS PRICES
SUMAS, WASHINGTON

<u>Month</u>	<u>\$/MMBtu</u>
August 2001	\$2.42
September	2.17
October	1.37
November	2.76
December	2.67
January 2002	2.56
February	1.85
March	2.12
April	3.16
May	2.81
June	2.42
July	1.37

Annual Average Price = \$2.31

Sources:

- (1) 2001 from Gas Daily Annual Price Guide NW
Sumas volume-weighted average cost of gas.
- (2) 2002 from Inside FERC Gas Market Report first
of month index for Canadian Border Deliveries.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 5th day of August, 2002, I served a true and correct copy of the Direct Rebuttal Testimony and Exhibits of Dennis E. Peseau in Case No. GNR-E-02-1 upon the following named parties by the method indicated below, and addressed to the following:

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/s/

BARTON L. KLINE